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December 4, 1998

Magalie Roman Salas
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

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DEC - 4 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Amy Zoslov

**Re: Cellular Mobile Systems of St. Cloud Petition for Waiver Pursuant to
Section 20.18(c) of the Commission's Rules; CC Docket No. 94-102**

Dear Ms. Salas:

Transmitted herewith, on behalf of Cellular Mobile Systems of St. Cloud ("St. Cloud") and pursuant to §1.3 of the Federal Communications Commission's ("Commission") rules, are an original and four copies of St. Cloud's Petition for Waiver of the December 31, 1998 deadline ending the suspension of enforcement of Section 20.18(c) of the Commission's rules, as that section relates to the transmission of 911 calls made from TTY devices using digital wireless systems.

Should you have any questions concerning this matter, please communicate directly with the undersigned.

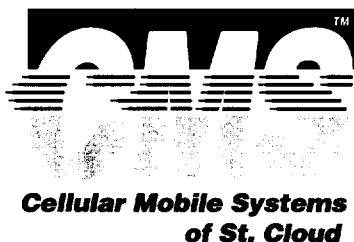
Sincerely,

Michael R. Bennet

Michael R. Bennet

MRB/jmb
Enclosures

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December 3, 1998

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Pursuant to § 1.3 of the Rules of the Federal Communications Commission ("FCC" or "Commission"),¹ Cellular Mobile Systems of St. Cloud hereby requests a limited waiver of the December 31, 1998 deadline ending the suspension of enforcement of Section 20.18(c) of the Commission's Rules, as that section relates to the transmission of 911 calls made from TTY devices using digital wireless systems in the Commission's November 13, 1998 Order.² Cellular Mobile Systems of St. Cloud is filing this petition because it is unable to comply with the requirements of Section 20.18(c) mandating that TTY users must be able to access 911 over digital wireless phones.

Cellular Mobile Systems of St. Cloud has been working with Nortel to make steps toward compliance. Please find enclosed a letter from Nortel stating the status of the equipment's compliance to the E911/TTY Access Rules.

Cellular Mobile Systems of St. Cloud plans to contact TTY users and potential users about only using analog.

Cellular Mobile Systems of St. Cloud is aware of the obligation to update the Commission every three months about the progress Nortel and we are making towards compliance.

Sincerely,

William O. Casto
General Manager

Enclosures

¹ 47 C.F.R. § 1.3 (1996)

² In the matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, RM-8143 (rel. November 13, 1998) ("Order").

NORTEL NETWORKS

December 2, 1998

CMS of St. Cloud
110 Division Street
Waite Park, MN 56387
Phone # 320/252-9000

Dear Bill Casto,

This letter is in response to your request for Nortel Networks to provide support information for CMS of St. Cloud to file a waiver request with the FCC regarding the E911/TTY rules. This response is intended to give you insight into our direction on this issue. It is based on the best technical information we have available and upon what may be required by the FCC rule.

With regard to analogue calls through the Nortel Networks equipment supplied to CMS of St. Cloud, to the best of our knowledge, our equipment is capable of transmitting 911 calls from people with speech or hearing disabilities through means other than the mobile handset, as an example through use of Text Telephone Devices (TTY). However, as noted below, most TTYs (a/k/a TTDs) in use today have not been designed to connect with wireless handsets, and the 911 text message may be corrupted by the consumers' equipment. Further, Nortel Networks believes that without extensive testing of text messages over analogue systems, it is premature to assume all 911 calls will be received by the 911 call center essentially error free.

With regard to digital calls through Nortel Networks equipment using the IS-95 CDMA air interface, the equipment, in the short term, is likely to not be capable of transmitting the 911 call with sufficient error free text to elicit proper 911 response.

With regard to digital calls through Nortel Networks equipment using the IS-136 TDMA air interface, the equipment, in the short term, may be capable of transmitting the 911 calls with sufficient error free text to elicit proper 911 response, depending upon the type of vocoder used in the system, the type of text message equipment used, and the type of handset used.

Industry standards to support TTY operation in digital mode are not currently defined. Nortel Networks is working with other equipment manufacturers and carriers to define the required design standards needed to develop this service. History tells us that it typically takes twelve to eighteen months from the adoption of standards to the commercial availability of product. However, in this instance, if the TTY is to be a part of the phone path to send text messages

for people with hearing or speech disabilities, then TTY manufacturers must work sincerely and cooperatively with wireless manufacturers to develop a workable standard. As technical TTY considerations must be considered for a good standard, the wireless industry cannot develop a good standard without technical assistance from TTY manufacturers. Nortel Networks consequently cannot project when a design standard will be in place. In the interim, consumers may wish to test placing text calls over the digital path, or set their handsets to transmit only in analogue mode for text message calls.

If the 911 call content is corrupted by the TTY consumer devices used by speech or hearing disabled users, Nortel Networks system equipment will not be able to correct the errors. Nortel Networks is aware that the vast majority of TTYs are not designed to connect to wireless handsets, and such lack of good connection frequently corrupts messages before they reach the system networks. There are some TTY equipment models that have connections that facilitate properly connecting handsets and the TTY, but we believe few are in use. As you are aware, Nortel Networks does not currently manufacture wireless handsets, and is unable to resolve this connectivity problem. In addition, Nortel Networks is not aware of any TTY that has been designed for its tones to be carried error free over digital vocoders designed for human speech. Therefore, the digital audio path is more prone to create text errors more frequently than text messages over analogue audio paths.

Complicating the task of providing text-messaging capability for those with hearing and speech disabilities, is the lack of standards in the TTY industry. The TTY has been the most used text message system for the hearing and speech disabled users covered by the FCC's 911 rule, but there does not appear to be a single solution that would work for all TTY devices in use. In addition to the TTY, consumers are using the Internet for sending and receiving text messages. Nortel Networks is aware that people with hearing and speech disabilities, increasingly use the Internet for communication, and the Internet may become a method for placing 911 calls into the future.

The wireless industry has been working with consumer representatives and TTY manufacturers in the TTY Forum for almost two years. Nortel Networks is hopeful that information sharing from this group and comprehensive testing will identify practical solutions that manufacturers can incorporate into system solutions. However at this time Nortel Networks believes that a person with hearing or speech disabilities may find it difficult to place a wireless 911 call with the TTY equipment that they use for wireline calls, and a solution for all TTY users is not achievable by 12-31-98.

Please contact Gary Lisch at 972/684-1888 to further discuss this issue with you at your convenience.

Sincerely,



Alan Pritchard
VP Marketing